

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

**POWERTRAIN, INC., A MISSISSIPPI  
CORPORATION**

**PLAINTIFF**

**v.**

**CAUSE NO.: 1:11-cv-00105-GHD-DAS**

**JOYCE MA, INDIVIDUALLY, AND  
BEST MACHINERY & ELECTRICAL, INC.**

**DEFENDANTS**

**JOYCE MA, INDIVIDUALLY**

**THIRD PARTY PLAINTIFF**

**v.**

**WILLIAM H. SHAWN, AND  
SHAWNCOULSON, LLP**

**THIRD PARTY DEFENDANTS**

**THIRD PARTY PLAINTIFF JOYCE MA'S  
OPPOSITION TO THIRD PARTY DEFENDANTS' MOTION TO DISMISS**

COMES NOW, Third Party Plaintiff, Joyce Ma ("Ma"), and files its  
Opposition to Third Party Defendants' Motion to Dismiss under Fed. R. Civ. P.  
12(b)(6). In support of her position, Ma has attached her Points and Authorities in  
Support of this Opposition.

**WHEREFORE,** Ma respectfully requests the Court to deny the Third Party Defendants' Motion to Dismiss. Alternatively, Ma respectfully requests leave from the Court to amend the Third Party Complaint.

Dated: February 20, 2014

Respectfully Submitted,

JOYCE MA  
DEFENDANT/THIRD PARTY PLAINTIFF

By /s/ Jeffery M. Navarro  
JEFFERY M. NAVARRO  
P.O. BOX 162  
AMORY, MS 38821  
662-256-3706  
MBN: 3755  
Attorney for Defendant/Third Party Plaintiff,  
Joyce Ma

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 20<sup>st</sup> day of February Septmber, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Jeffery M. Navarro

Jeffery M. Navarro